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11 United States of America  
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14 IN THE UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA  
16

17 UNITED STATES OF AMERICA,

CASE NO. 2:22-CR-00178-TLN

18 Plaintiff,

STIPULATION REGARDING EXCLUDABLE  
19 TIME PERIODS UNDER SPEEDY TRIAL ACT;  
v. FINDINGS AND ORDER

20 AURELIA AYON GUERRERO,

DATE: December 4, 2025

21 Defendant.

TIME: 9:30 a.m.

22 COURT: Hon. Troy L. Nunley  
23

24 STIPULATION

25 Plaintiff United States of America, by and through its counsel of record, and defendant Aurelia  
26 Ayon Guerrero, by and through her counsel of record, hereby stipulate as follows:

27 1. By previous order, this matter was set for status on December 4, 2025.

28 2. By this stipulation, defendant now moves to continue the status conference until January  
22, 2026, at 9:30 a.m., and to exclude time between December 4, 2025, and January 22, 2026, under  
Local Code T4.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes approximately 3,398 pages of documents, including investigative reports, text messages, transcripts of recorded communications, and other materials, as well as multiple undercover video and audio recordings. All of this discovery has been produced to counsel for defendant.

1                   b)     Defendant Ayon Guerrero made her initial appearance in this district on April 20,  
2 2023, based on charges contained in a criminal complaint.

3                   c)     On May 31, 2024, Ms. White was substituted into the case as counsel of record  
4 for defendant.

5                   d)     Counsel for defendant desires additional time to review the discovery, to conduct  
6 factual investigation, to evaluate potential responses to the charges, to confer with his client, and  
7 to otherwise prepare for trial.

8                   e)     The parties anticipate that, if the requested continuance is granted, they will  
9 request to set a trial date at the January 22, 2026 status conference if defendant does not plead  
10 guilty on that date.

11                  f)     Counsel for defendant believes that failure to grant the above-requested  
12 continuance would deny him the reasonable time necessary for effective preparation, taking into  
13 account the exercise of due diligence.

14                  g)     The government does not object to the continuance.

15                  h)     Based on the above-stated findings, the ends of justice served by continuing the  
16 case as requested outweigh the interest of the public and the defendant in a trial within the  
17 original date prescribed by the Speedy Trial Act.

18                  i)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
19 et seq., within which trial must commence, the time period of December 4, 2025 to January 22,  
20 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
21 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
22 of the Court's finding that the ends of justice served by taking such action outweigh the best  
23 interest of the public and the defendant in a speedy trial.

24         4.     Nothing in this stipulation and order shall preclude a finding that other provisions of the  
25 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
26 must commence.

27                  IT IS SO STIPULATED.

1  
2 Dated: December 1, 2025

ERIC GRANT  
United States Attorney

3  
4 /s/ DAVID W. SPENCER  
5 DAVID W. SPENCER  
6 Assistant United States Attorney

7 Dated: December 1, 2025

8 /s/ TONI WHITE  
9 TONI WHITE  
10 Counsel for Defendant  
11 AURELIA AYON GUERRERO

12 **ORDER**

13 IT IS SO FOUND AND ORDERED this 1<sup>st</sup> day of December, 2025.

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16 Troy L. Nunley  
17 Chief United States District Judge